

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**HAIR CLUB FOR MEN, LLC,**

**Plaintiff,**

**v.**

**LAILUMA EHSON and ILLUSION DAY  
SPA, LLC,**

**Defendants.**

**Civil Action No. 1:16-CV-236 LOG/JFA**

**PLAINTIFF'S MOTION FOR ATTORNEYS' FEES AND COSTS**

Plaintiff Hair Club for Men, LLC, by and through its undersigned counsel, hereby moves the Court for an Order granting Plaintiff attorneys' fees in the amount of \$297,523.80 and costs in the amount of \$11,706.90 against Defendants Lailuma Ehson and Illusion Day Spa, LLC. As set forth in the supporting Memorandum of Law, the Declarations of William J. Delany and Ronda B. Esaw and the exhibits attached thereto, and Hair Club's Bill of Costs, Hair Club is entitled to an award of attorneys' fees and costs under the Confidentiality, Non-Solicitation and Non-Compete Agreement entered into by Ehson and Hair Club, the Virginia Uniform Trade Secrets Act, and Federal Rule of Civil Procedure 54. Moreover, the attorneys' fees and costs sought by Hair Club are reasonable. For these reasons, and as set forth in the supporting documents, Hair Club requests that the Court enter an Order awarding Hair Club its attorneys' fees and costs.

Dated: December 14, 2016

MORGAN, LEWIS & BOCKIUS LLP

/s/ Jocelyn R. Cuttino

William J. Delany (admitted *pro hac vice*)

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*Attorneys for Plaintiff Hair Club for Men, LLC*

**CERTIFICATE OF SERVICE**

I certify that on December 14, 2016, the foregoing document was served via the Court's  
CM/ECF system on:

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/s/ Jocelyn R. Cuttino